6.0 OTHER SECTIONS REQUIRED BY NEPA AND/OR CEQA

6.1 GROWTH-INDUCING IMPACTS

Both NEPA and CEQA require consideration of indirect impacts of an action, including growth-inducing impacts. CEQ regulations (section 1508.8[b]) provide guidance to Federal agencies for evaluating indirect effects:

> Indirect effects are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.

State CEQA Guidelines section 15126.2(d) gives the most specific guidance for assessing growth-inducing impacts, stating that an EIR must discuss the ways in which a project could:

- foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment;
- remove obstacles to population growth;
- require the construction of new community facilities that could cause significant environmental effects; or
- encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

The Conservation Plan would not foster economic growth or the construction of additional housing, nor would it create new job opportunities. Rather, as discussed in section 3.16.2.1, agricultural jobs and revenue could be lost if agricultural lands were used for the establishment of conservation areas. The implementation of the proposed action would not remove an obstacle to growth since no major infrastructure would be constructed, nor would any existing conditions that prevent growth be altered by the proposed action. New access roads and irrigation infrastructure would be sized and positioned to serve only the conservation areas or new field or fish rearing facilities. The Conservation Plan also would not require new community facilities. It is anticipated that one new law enforcement officer and one new wildland fire fighter would be provided, respectively, for every 5,000 and 2,500 acres of conserved land not already in public ownership. All new personnel would be stationed at existing facilities. Additionally, the Conservation Plan includes a number of provisions that would minimize the potential impacts from wildland fires and thus would not require the expansion of fire protection services by other agencies.

As described under the no action alternative (section 2.1.2), the covered activities likely would be implemented whether or not the Conservation Plan were carried forward. Thus, no other aspects of the proposed action would encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

The proposed action would not have growth-inducing impacts, nor would the other action alternatives, since they involve the implementation of a Conservation Plan with the same

general elements as the proposed action and would differ only with regard to the location and amount of conservation area established.

6.2 RELATIONSHIP BETWEEN SHORT-TERM USES AND LONG-TERM PRODUCTIVITY

NEPA (40 CFR 1502.16) requires that an EIS include a discussion of the relationship between the short-term uses of man's environment and the maintenance and enhancement of long-term productivity. All of the alternatives would result in the long-term use of the environment for conservation area establishment. Construction of this habitat could result in short-term impacts to resources such as aesthetics, air quality, biological resources, energy, hazards, hydrology and water quality, noise, and geology. With the exception of construction-related impacts associated with air quality, including environmental justice impacts under Alternatives 1, 2, and 3, these impacts are found to be less than significant or would be mitigated to less than significant through the implementation of measures identified in this EIS/EIR. Long-term adverse impacts would be associated with the potential conversion of agricultural land to other land cover types, along with concomitant socioeconomic and environmental justice impacts. Additionally, Alternative 4 could result in significant but mitigable impacts to sensitive native fish habitat along the Virgin and Muddy rivers. To the extent that agricultural lands were converted to other land cover types, the economic productivity of these lands would be lost, but these effects are not significant.

The Conservation Plan would result in long-term benefits to biological resources, as well as more modest benefits to aesthetics and water quality. The proposed action would result in the creation of 7,260 acres of cottonwood-willow and honey mesquite land cover type, which would increase the extent of cottonwood-willow and mesquite woodland sensitive communities. The proposed action also would result in the establishment of 512 acres of marsh and 360 acres of backwaters. These actions would represent a beneficial impact for vegetation as well as for the covered and non-covered wildlife species using these habitat types. Expansion of native plant communities would provide habitat for native species, including species whose populations have declined due to loss or degradation of habitat, and help to restore the natural ecosystems that these communities can support. The establishment of additional habitat would allow population expansion for these species, a beneficial impact. The level of disturbance to wildlife by agricultural workers and machinery would be reduced. In addition, the conversion of agricultural land to riparian land cover types would lessen the input of sediment, salts, nutrients, and agricultural chemicals to the river, improving water quality and aquatic habitat conditions. The establishment of riparian vegetation along an expanded portion of the river would provide increased shading, water filtration, and nutrient and pollutant uptake, improving water quality and aquatic habitat conditions downstream. Establishing native plant communities would aid in soil stabilization, a benefit for micro-organisms and invertebrates that live in the soil as well as vertebrates that burrow in the ground. Irrigation that mimics natural hydrologic regimes would also benefit native ground-dwelling species adapted to those conditions.

Aesthetic benefits would result from returning conservation sites to a more natural appearance. Implementation of the Conservation Plan would establish and maintain over 8,100 acres of land that are currently in agricultural production or undeveloped land that is characterized by

invasive, non-native species. The proposed action also includes measures that would establish native vegetation in the event of wildfires. Currently, when fires occur, native vegetation is often supplanted by saltcedar, which is an invasive, introduced species.

Long-term water quality benefits would occur if agricultural land were converted to habitat since the conversion of agricultural land to riparian habitat would lessen the input of nutrients and agricultural chemicals to the river, improving water quality and aquatic habitat conditions. The establishment of riparian vegetation along an expanded portion of the river would provide increased shading, water filtration, and nutrient and pollutant uptake, improving water quality and aquatic habitat conditions downstream. This impact would be beneficial.

6.3 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

State CEQA Guidelines section 15126.2(c) requires that an EIR analyze:

> …significant irreversible environmental changes which would be caused by the Proposed Project should it be implemented. Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

The Conservation Plan would require use of a variety of construction materials for the construction of irrigation and field facilities as well as roadways. In addition, agricultural lands, including Important Farmlands, used for conservation area establishment would be committed to non-agricultural use for the 50-year duration of the LCR MSCP. After this time, however, the land could conceivably be returned to agricultural use since the soils would not be removed. Water would be required to establish and maintain habitat and would be unavailable for other purposes for the 50-year duration of the LCR MSCP. Minimal amounts of potable water would be required to serve the two field facilities should they be constructed.

6.4 UNAVOIDABLE ADVERSE IMPACTS

Unavoidable adverse impacts are those significant environmental effects of the proposed project that cannot be avoided or substantially lessened as required under CEQA (State CEQA Guidelines section 15091). The proposed action and alternatives would result in significant, potentially unavoidable short-term air quality impacts. Table 6.4-1 summarizes the impacts of the proposed action and alternatives, including unavoidable adverse impacts on those environmental resources evaluated pursuant to CEQA. NEPA does not require the determination of unavoidable adverse impacts.

Table 6.4-1. Summary of Impacts and Mitigation Measures

Impact	APPLICABLE ALTERNATIVE				*Mitigation Measure*[3]	*Unavoidable Adverse Impacts*
	2 No Action[1]	*1 Proposed Action*	*3 Listed Species Only*[2]	*4 Off-Site Conservation*		
AESTHETICS						
AESTH-1: Construction/maintenance activities would temporarily lessen the visual quality of the conservation area establishment sites located on or near visually sensitive resources (*less than significant impact*).	X	X	X	X	None required	None
AESTH-2: The construction of field facilities and fish-rearing facilities could be required, which could alter the visual quality of the selected sites (*less than significant impact*).	X	X	X	X	None required	None
AESTH-3: Conservation area establishment would return sites to a more natural appearance (*beneficial impact).*	X	X	X	X	None required	None
AGRICULTURAL RESOURCES						
AG-1: Important Farmland could be converted to a nonagricultural use (*less than significant impact*).	X	X	X	X	None required	None
AG-2: Waterfowl attracted to established backwaters and marshes could destroy crops grown on adjacent farmland *(less than significant impact*).	X	X	X	X	None required	None
AG-3: Runoff from established conservation areas could alter the slopes of adjoining laser-leveled fields (*significant impact*).	X	X	X	X	AG-1: Develop grading plans for newly established conservation areas that direct runoff away from adjacent agricultural lands to ensure that flow rates from the conservation area do not exceed existing discharge rates.	None
AG-4: Covered species attracted to established conservation areas could disperse to other lands within the planning area *(less than significant impact*).	X	X	X	X	None required	None
AIR QUALITY						
AQ-1: The use of fossil fuel-fired construction equipment during construction, maintenance, and operational activities would result in intermittent combustive emissions that would not violate any air quality standard or contribute substantially to an existing or projected air quality violation (*less than significant impact*).	X	X	X	X	None required	None

Table 6.4-1. Summary of Impacts and Mitigation Measures (continued)

Impact	APPLICABLE ALTERNATIVE				*Mitigation Measure*[3]	*Unavoidable Adverse Impacts*
	2 No Action[1]	*1 Proposed Action*	*3 Listed Species Only*[2]	*4 Off-Site Conservation*		
AIR QUALITY						
AQ-2: The development of the largest projects would produce fugitive dust emissions that could exceed an ambient 24-hour PM10 standard (*significant impact*).	X	X	X	X	AQ-1: Implement standard operating practices to minimize fugitive dust (PM10) emissions during construction activities.	Potentially Significant
AQ-3: Emissions from the largest prescribed burns during terrestrial vegetation establishment or maintenance activities would produce emissions that could contribute to an exceedance of an ambient 24-hour PM10 standard (*significant impact*).	X	X	X	X	AQ-2: Implement a smoke management plan for all construction and maintenance activities involving the use of fire.	Potentially Significant
AQ-4: Air emissions from proposed conservation area establishment activities and facility construction could exceed the MDAQMD daily NOx or PM10 emission significance thresholds, which would result in a cumulatively considerable net increase of a nonattainment pollutant (*significant impact*).	X	X	X		See Mitigation Measure AQ-1.	Significant
AQ-5: Air emissions from the proposed conservation area establishment activities would not expose sensitive receptors to substantial pollutant concentrations (*less than significant impact*).	X	X	X	X	None required	None
AQ-6: Air emissions from the proposed conservation area establishment activities would not create objectionable odors that affect a substantial number of people (*less than significant impact*).	X	X	X	X	None required	None
BIOLOGICAL RESOURCES						
BIO-1: Issuance of the section 10(a)(1)(B) permit would authorize the incidental take of up to 27 covered species from implementation of both the covered activities and the Conservation Plan (*less than significant impact*).		X	X	X	None required	None

Table 6.4-1. Summary of Impacts and Mitigation Measures (continued)

Impact	APPLICABLE ALTERNATIVE				*Mitigation Measure*[3]	*Unavoidable Adverse Impacts*
	2 No Action[1]	*1 Proposed Action*	*3 Listed Species Only*[2]	*4 Off-Site Conservation*		
BIOLOGICAL RESOURCES						
BIO-2: The establishment of 7,260 acres of cottonwood-willow and honey mesquite land cover would increase the extent of cottonwood-willow riparian forest and mesquite woodland sensitive communities (*beneficial*).	X	X	X[4]	X	None required	None
BIO-3: Clearing, grading, planting, and site maintenance during conversion of agricultural lands to cottonwood-willow and/or honey mesquite land cover types would result in the elimination of existing low value habitat used by resident and migratory wildlife, removal of weedy vegetation and crops, alteration of habitat characteristics through changes in local hydrology and exposure of soil to erosion, and elimination or displacement of resident wildlife (*less than significant short-term impacts; beneficial long-term impacts*).	X	X	X	X	None required	None
BIO-4: Clearing, grading, planting, and site maintenance during conversion of undeveloped lands (primarily saltcedar) to cottonwood-willow and/or honey mesquite land cover types would result in the elimination of existing non-native vegetation and the habitat it provides for wildlife, short-term effects on habitat characteristics from alteration of local hydrology and exposure of soil to erosion, and elimination or displacement of resident wildlife (*less than significant short-term impacts; beneficial long-term impacts*).	X	X	X	X	None required	None
BIO-5: Clearing, grading, planting, and site maintenance during establishment of marsh would result in the long-term elimination of existing vegetation and the habitat it provides for wildlife, alteration of habitat conditions through changes in local hydrology and exposure of soil to erosion, and elimination or displacement of resident wildlife (*less than significant short-term impacts; beneficial long-term impacts*).	X	X	X	X	None required	None

Table 6.4-1. Summary of Impacts and Mitigation Measures (continued)

Impact	APPLICABLE ALTERNATIVE				*Mitigation Measure*[3]	*Unavoidable Adverse Impacts*
	2 No Action[1]	*1 Proposed Action*	*3 Listed Species Only*[2]	*4 Off-Site Conservation*		
BIOLOGICAL RESOURCES						
BIO-6: Clearing, grading, and site maintenance during establishment of backwaters would result in the long-term elimination of existing vegetation and the habitat it provides for wildlife, alteration of habitat conditions through changes in local hydrology and exposure of soil to erosion, and elimination or displacement of resident wildlife (*less than significant* or *significant short-term impacts; beneficial long-term impacts).*	X	X	X	X	BIO-1: Conduct site-specific surveys for non-covered sensitive species during selection of land cover type establishment or enhancement (e.g., existing backwaters) areas and, if any are found, then implement measures appropriate for the specific site and species to avoid or minimize impacts to the extent feasible without causing impacts on covered species. These may include measures specified in the Conservation Plan to avoid or minimize potential effects on covered species (e.g., scheduling to avoid breeding times).	None
BIO-7: Maintenance of established habitats would result in the removal of invasive non-native vegetation, alteration of habitat characteristics through changes in local hydrology, and short-term elimination or displacement of resident wildlife (*less than significant short-term impacts; less than significant or beneficial long-term impacts*).	X	X	X	X	None required	None
BIO-8: Population enhancement activities for covered fish and bird species could adversely affect existing individuals or populations of covered or sensitive species (*less than significant short-term impacts; beneficial long-term impacts*).	X	X	X	X	None required	None
BIO-9: Native land cover type establishment and maintenance could temporarily affect wetlands and waters of the U.S (*less than significant short-term impacts; beneficial long-term impacts*).	X	X	X	X	None required	None
BIO-10: Land cover type establishment and maintenance activities could result in periodic short-term impacts on sensitive and common native fishes inhabiting the Virgin and Muddy rivers (*less than significant impact*).	X			X	None required	None

Table 6.4-1. Summary of Impacts and Mitigation Measures (continued)

Impact	APPLICABLE ALTERNATIVE				*Mitigation Measure*[3]	*Unavoidable Adverse Impacts*
	2 No Action[1]	*1 Proposed Action*	*3 Listed Species Only*[2]	*4 Off-Site Conservation*		
BIOLOGICAL RESOURCES						
BIO-11: Construction to establish/enhance native land cover types could result in the long-term loss or degradation of sensitive native fish habitats in the Virgin and Muddy rivers (*significant impact*).	X[5]			X	BIO-2: Design site-specific land cover type establishment plans to avoid and minimize potential effects on sensitive native fish habitats along the Virgin and Muddy rivers. Preparation of the design plans shall be coordinated with and approved by the Service as part of section 7 consultation. If appropriate, design plans shall include measures to rehabilitate any affected habitat.	None
CULTURAL AND HISTORIC RESOURCES						
CULT-1: Disturbance of the ground surface could directly or indirectly disturb or destroy significant archaeological or historical resources, particularly in undeveloped or previously undisturbed areas (*significant impact*).	X	X	X	X	CULT-1: Consult with the appropriate SHPO(s), tribes, and other interested parties, perform archival research, interview informants, conduct cultural resource inventories; evaluate all identified cultural resources for potential listing on the NRHP or state or local registers; modify project design, when feasible, to avoid cultural resources eligible for listing; develop and implement a pre-construction Testing and Evaluation Plan, pre-construction Data Recovery Plan, and Cultural Resources Construction Monitoring Plan (CRCMP) as appropriate; re-direct construction as needed if new cultural resources sites are found, document new discoveries, and avoid sites or implement a data recovery program; initiate consultation with any known lineal descendants and relevant Indian tribes as per NAGPRA or follow state and local laws as appropriate; incorporate these procedures into all archaeological testing and/or data recovery plans and the CRCMP.	None

Table 6.4-1. Summary of Impacts and Mitigation Measures (continued)

Impact	APPLICABLE ALTERNATIVE				*Mitigation Measure*[3]	*Unavoidable Adverse Impacts*
	2 No Action[1]	*1 Proposed Action*	*3 Listed Species Only*[2]	*4 Off-Site Conservation*		
CULTURAL AND HISTORIC RESOURCES						
CULT-2: Cultural resources may be affected by unauthorized artifact collection during construction or by a lack of awareness of cultural resource mitigation measures on the part of construction personnel (*significant impact*).	X	X	X	X	See Mitigation Measure CULT-1	None
ENERGY AND DEPLETABLE RESOURCES						
Minor impact associated with use of diesel fuel and electrical power during construction and operations. Negligible impact to hydropower production due to consumptive use of water for conservation areas.	X	X	X	X	None required	None
ENVIRONMENTAL JUSTICE						
EJ-1. Significant, short-term air quality impacts from construction activities and prescribed burns in or near agricultural areas could result in disproportionate impacts to minority and low-income populations.	X[6]	X	X	X[6]	Implement Mitigation Measures AQ-1 and AQ-2	Not applicable
EJ-2. Noise from construction and pumps that exceeded local standards could disproportionately affect minority and low-income populations.	X[6]	X	X	X[6]	Implement Mitigation Measures NOI-1 and NOI-2	Not applicable
EJ-3: If agricultural land were converted to conservation areas, the loss of agricultural jobs would disproportionately affect minority and low-income populations.	X	X	X	X	EJ-1: Reclamation shall work with local jurisdictions and/or growers to ensure that agricultural workers are notified as soon as possible of the potential for a loss of jobs once specific project locations have been identified. Reclamation will encourage the local jurisdictions and/or growers to provide timely information and assistance to agricultural workers regarding the availability of alternative employment.	Not applicable
HAZARDS AND HAZARDOUS MATERIALS						
HAZ-1: The use of pesticides, lubricants, fuels, and other hazardous materials during construction, operations, and maintenance could result in localized spills, which could create a hazard to the environment (*less than significant impact*).	X	X	X	X	None required	None

Table 6.4-1. Summary of Impacts and Mitigation Measures (continued)

Impact	APPLICABLE ALTERNATIVE				*Mitigation Measure*[3]	*Unavoidable Adverse Impacts*
	2 No Action[1]	*1 Proposed Action*	*3 Listed Species Only*[2]	*4 Off-Site Conservation*		
HAZARDS AND HAZARDOUS MATERIALS						
HAZ-2: The increase in riparian and backwater areas could result in an increase in vectors (*less than significant impact).*	X	X	X	X	None required	None
HAZ-3: Construction activities could cause wildfires (*less than significant impact).*	X	X	X	X	None required	None
HAZ-4: Fire used as a construction and maintenance tool could escape control and become a wildland fire (*less than significant impact).*	X	X	X	X	None required	None
HAZ-5: Conservation area establishment actions implemented within an Accident Potential Zone of an airport or near a private airstrip could cause a comparatively minor increase in bird populations (*less than significant impact).*	X	X	X	X	None required	None
HYDROLOGY AND WATER QUALITY						
HYDRO-1: Habitat establishment activities could result in erosion-induced siltation (*less than significant impact*).	X	X	X	X	None required	None
HYDRO-2: Habitat establishment could have a short-term adverse effect to water quality if irrigation mobilized (released) pesticides, salts, or other contaminants (*less than significant impact*).	X	X	X	X	None required	None
HYDRO-3: Water quality in created or restored backwaters and marshes could be affected by increasing concentrations of various naturally occurring and man-made chemicals (both in the soil and the water column) that result from evaporation of water (*less than significant impact*).	X	X	X	X	None required	None
HYDRO-4: Conservation area establishment would result in a long-term improvement to water quality if agricultural land were used (*beneficial impact*).	X	X	X	X	None required	None

Table 6.4-1. Summary of Impacts and Mitigation Measures (continued)

Impact	APPLICABLE ALTERNATIVE				*Mitigation Measure*[3]	*Unavoidable Adverse Impacts*
	2 No Action[1]	*1 Proposed Action*	*3 Listed Species Only*[2]	*4 Off-Site Conservation*		
INDIAN TRUST ASSETS						
ITA-1: Implementing conservation measures on tribal land could result in changes to all classes of ITAs.	X[7]	X	X	X[7]	None required.	Not applicable
LAND USE						
No significant impacts specific to land use were identified, although significant land use conflicts were identified in the agricultural resources and noise analyses (Impacts AG-3, AG-4, NOI-1, and NOI-2).	X	X	X	X	Implement Mitigation Measures AG-1, NOI-1, and NOI-2**.**	None
NOISE						
NOI-1: Construction activities could cause a temporary, substantial increase in ambient noise levels that could exceed local standards if construction occurred in proximity to noise-sensitive receptors (*significant impact)*.	X	X	X	X	NOI-1: As needed, select quieter equipment; use noise control devices on equipment, locate equipment away from sensitive receptors; notify nearby neighbors prior to work; minimize idling, use noise barriers; and where possible, limit construction to non-mating, non-nesting seasons of noise-sensitive species.	None
NOI-2: Pumps located near noise-sensitive receptors could cause a substantial increase in ambient noise levels or exceed regulatory thresholds (*significant impact)*.	X	X	X	X	NOI-2: If pumps cannot be located at sufficient distances from sensitive receptors to avoid the exceedance of a local noise standard or a substantial increase in the ambient noise level at the sensitive receptors, construct barriers or enclosures to ensure adherence to local standards.	None
POPULATION AND HOUSING						
No impact on population or housing.	X	X	X	X	None required	None

Table 6.4-1. Summary of Impacts and Mitigation Measures (continued)

Impact	APPLICABLE ALTERNATIVE				*Mitigation Measure*[3]	*Unavoidable Adverse Impacts*
	2 No Action[1]	*1 Proposed Action*	*3 Listed Species Only*[2]	*4 Off-Site Conservation*		
PUBLIC SERVICES AND UTILITIES						
Minimal impacts to water treatment, storm drainage, and water supply from the potential construction and operation of two field facilities. Minor impacts to landfill capacity from construction and operations.	X	X	X	X	None required	None
RECREATION						
REC-1: The implementation of certain conservation measures could result in the loss of recreational opportunities (*less than significant impact*).	X	X	X	X	None required	None
SOCIOECONOMICS						
SOC-1: Agricultural jobs would be lost if agricultural land were converted to conservation areas.	X	X	X	X	None required	None
SOC-2: Agricultural-related revenue would be lost if agricultural land were converted to conservation areas.	X	X	X	X	None required	None
SOC-3: Local property tax revenues could be reduced if privately owned land were leased or acquired by the Federal or state participants in the LCR MSCP.	X	X	X	X	None required	None
SOCIOECONOMICS						
SOC-4: Local sales tax from the purchase of products related to agricultural uses would be reduced if privately owned agricultural land was placed in public ownership.	X	X	X	X	None required	None
TOPOGRAPHY, GEOLOGY, SOILS, AND MINERAL RESOURCES						
GEO-1: Activities associated with conservation area establishment could result in erosion-induced siltation of the Colorado River (*less than significant impact*).	X	X	X	X	None required	None
TRANSBOUNDARY IMPACTS						
TRANS-1: PM_{10} and combustive emissions from the construction and maintenance of created conservation areas in Reach 7 could disperse to Mexico.	X[8]	X	X		None required	Not applicable

Table 6.4-1. Summary of Impacts and Mitigation Measures (continued)

Impact	APPLICABLE ALTERNATIVE				*Mitigation Measure*[3]	*Unavoidable Adverse Impacts*
	2 No Action[1]	*1 Proposed Action*	*3 Listed Species Only*[2]	*4 Off-Site Conservation*		
TRANSPORTATION						
Minor impact from construction traffic.	X	X	X	X	None required	None

1 The no action alternative would result in similar types of impacts as the proposed action since similar conservation measures likely would be implemented. It is likely, however, that a smaller amount of conservation area would be established or maintained, thus reducing the intensity or magnitude of the impacts, including beneficial impacts. Some conservation could occur in the off-site conservation areas, and impacts could occur in these areas as well as in the planning area.

2 The listed species only alternative would result in the establishment of a smaller amount of conservation area than the proposed action. The same types of impacts would occur, but the intensity, or magnitude, would be reduced, including that of beneficial impacts.

3 The development and implementation of mitigation measures for the no action alternative is outside the authority of the lead agencies for this EIS/EIR. The mitigation measures included in this table are examples of measures that could be implemented to reduce impacts associated with the no action alternative.

4 Less cottonwood-willow habitat and no honey mesquite habitat would be established under this alternative.

5 These impacts could occur under the no action alternative to the extent that conservation area creation occurred in the off-site conservation areas.

6 Under Alternative 2, these impacts would not occur to the extent that conservation areas were created in the off-site conservation areas. Air quality and noise impacts would not disproportionately affect minority and low-income populations in the off-site conservation areas. Under Alternative 4, impacts would be associated only with the creation of 360 acres of backwaters along the LCR.

7 Under Alternative 2, these impacts would not occur to the extent that conservation areas were created in the off-site conservation areas. Under Alternative 4, impacts would be associated only with the creation of 360 acres of backwaters along the LCR. No tribal lands or ITAS are present in any of the off-site conservation areas.

8 Transboundary impacts would not occur if conservation occurred only in the off-site conservation areas or in Reaches 1-6.

Not applicable: CEQA does not require analysis of this resource area and NEPA does not require the determination of unavoidable adverse impacts. Thus, no determination of unavoidable adverse impacts has been provided.

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